

**INTEGRATIVE THERAPEUTICS INC.**NF Formulas • PhytoPharmica  
Tyler Encapsulations • Vitaline Formulas9755 SW Commerce Circle, Suite B2 -  
Wilsonville, OR 97071 451  
P: 503.582.8386 • F: 503.582.0467**ENZYMATIC THERAPY\*****&  
PHYTOPHARMICA\***825 Challenger Drive, Green Bay, WI 54311-8328  
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)  
P: 920.469.9099 • F: 920.469.4418 (Phyto)**ENZYMATIC THERAPY**

INCORPORATED

*What **Better** feels like.™*

May 20, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

MAY 25 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

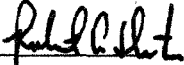
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Dietary supplement to promote bone health*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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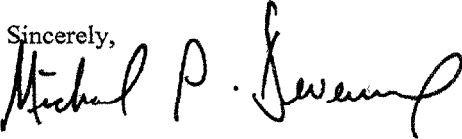
16269

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/20/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,  


Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Magnesium activates enzymes that help form new calcium crystals.*	Magnesium (as magnesium oxide and magnesium aspartate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/20/05

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Calcium is important - more than 99% of the body's calcium is found in the bones and teeth. But the body also needs vitamin D to properly use calcium and phosphorus.*	Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Vitamin D3 (as cholecalciferol)

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By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Supports and maintains healthy bones and bone structure.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone – 7)

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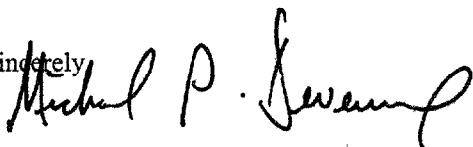
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Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	The body needs vitamin D to utilize calcium and phosphorus properly for building strong bones and teeth.*	Phosphorus (as tricalcium phosphate), Vitamin D3 (as cholecalciferol)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

5/20/05

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Vitamin K aids the production of osteocalcin, the supporting structure on which calcium crystallizes in bone.*	Vitamin K (as phytonadione)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime® Plus	Manganese is needed for bone mineralization and connective tissue synthesis.*	Manganese (as manganese aspartate)

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By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Studies show zinc, strontium, vitamin B6, vitamin C, silicon, copper, and boron also help form the connective structures in bones.*	Silicon (as magnesium trisilicate), Strontium (as strontium chloride), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Zinc (as zinc picolinate), Copper (as copper gluconate), Vitamin B6 (as pyridoxine HCl)

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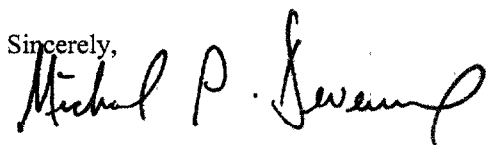
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	OsteoPrime Plus, formulated by Jonathan Wright, M.D., provides a balanced combination of these important nutrients to support and maintain healthy bones.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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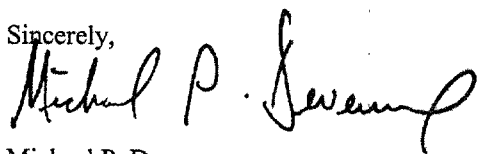
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OsteoPrime®* Plus	Vitamin K attracts calcium to bone tissue.*	Vitamin K (as phytonadione), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone – 7)

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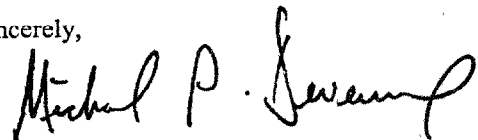
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OsteoPrime® Plus	Healthy bones need: Manganese, zinc, strontium, vitamin B6, vitamin C, silicon, copper and boron to aid bone and connective tissue development.*	Silicon (as magnesium trisilicate), Strontium (as strontium chloride), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Zinc (as zinc picolinate), Copper (as copper gluconate), Vitamin B6 (as pyridoxine HCl), Manganese (as manganese aspartate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

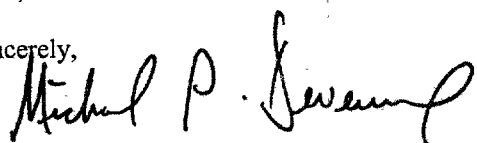
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/23/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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&  
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P: 920.469.9099 • F: 920.469.4418 (Phyto)

May 23, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

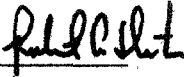
RE: Label Claims/Disclaimers

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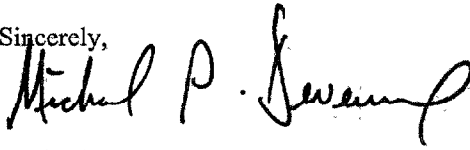
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	OsteoPrime Plus provides a balanced combination of important nutrients to support and maintain healthy bones in women and is targeted to work especially well for women during menopause.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/23/05

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Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer





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Office of Nutritional Products, Labeling &  
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Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740


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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Lifestage 3 gives you a full range of nutritional support, keeps those bones healthy and strong and controls menopausal symptoms.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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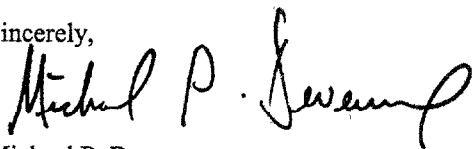
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/23/05

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Sincerely,



Michael P. Devereux  
Chief Financial Officer



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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

May 24, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	OsteoPrime Plus provides a balanced combination of important nutrients to support and maintain healthy bones in women and is targeted to work especially well for women during menopause and post-menopausal years.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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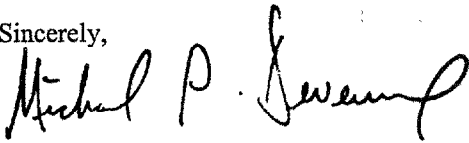
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/05

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Sincerely,



Michael P. Devereux  
Chief Financial Officer



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May 24, 2005

Office of Nutritional Products, Labeling &  
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Center for Food Safety and Applied Nutrition  
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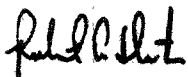
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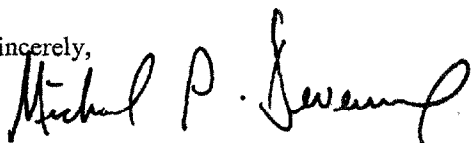
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Enzymatic Therapy's Lifestage System is a 3-Stage system for every woman's life! Each system includes a stage-specific multivitamin, targeted bone health support and relief for the uncomfortable symptoms of PMS, perimenopause and menopause.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/24/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer



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May 24, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
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5100 Paint Branch Parkway  
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RE: Label Claims/Disclaimers

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Take Control of: Hot flashes, Night sweats, Low energy, Mood swings, Restless sleep, Irritability, Calcium needs, Inadequate vitamin levels*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone - 7)

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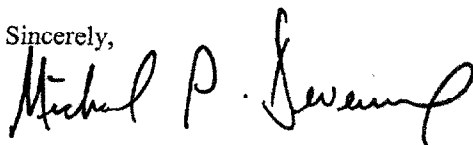
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/05

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Sincerely,



Michael P. Devereux  
Chief Financial Officer





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May 24, 2005

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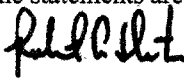
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Offers a balanced combination of nutrients to support and maintain healthy bones, including calcium for strong bones and teeth; magnesium to help form new calcium crystals; and zinc, vitamin C, and boron to help form the connective structures of the bone*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone – 7)

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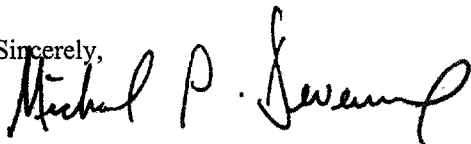
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	And healthy bones need a variety of nutrients to preserve adequate mineral mass, and maintain strong supporting structures.*	Silicon (as magnesium trisilicate), Vitamin B12 (as cyanocobalamin), Selenium (as sodium selenite), Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate), Strontium (as strontium chloride), Manganese (as manganese aspartate), Molybdenum (as sodium molybdate), Sodium (from Sodium Molybdate Dihydrate), Chromium (as chromium aspartate), Betaine HCl, Magnesium (as magnesium oxide and magnesium aspartate), Boron (as boron Krebs cycle chelates), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol), Zinc (as zinc picolinate), Copper (as copper gluconate), Pantothenic Acid (as calcium D-pantothenate), Thiamin (as thiamin HCl) (vitamin B1), Vitamin B6 (as pyridoxine HCl), Niacin (as niacinamide), Folic Acid, Riboflavin (vitamin B2), Natto (fermented soybeans containing 45 mcg of Vitamin K2 as Menaquinone – 7)

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime®* Plus	Calcium is primary building material for bones - more than 99% of the body's calcium is found in the bones and teeth.*	Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Phosphorus (as tricalcium phosphate),

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

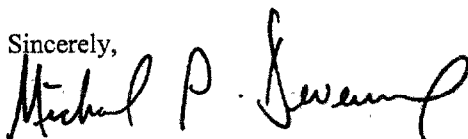
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



## ENZYMATIC THERAPY INCORPORATED

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May 25, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
OsteoPrime® Plus	Magnesium is vital to the ongoing process of bone formation.*	Magnesium (as magnesium oxide and magnesium aspartate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

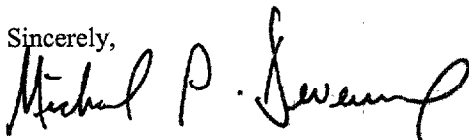
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/25/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer